Mr. Gary Hutt
IVC Industrial Coatings Inc.
P.O. Box 18163
Indianapolis, IN 46221

Re: 097-11727
First Significant Permit Revision to
Part 70 No.: T 097-7794-00303

Dear Mr. Hutt:

IVC Industrial Coatings Inc. was issued a Part 70 Operating Permit on 12/28/98 for a coating manufacturing operation. A letter requesting changes to this permit was received on 12/14/99. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

This modification resulted from IVC request to limit the record keeping and reporting associated with individual mixers located at the plant. This modification was approved based on the fact that the production capacity of the individual mixers, identified as Shar 1-1 through 1-4 at plant 1 and Shar 4-1 through 4-5 at plant 4, are limited by the associated Fill unit.

As a result of this determination the existing limitations on Fill 1 and 4, of less than 25 tons per year of VOC per Fill unit taken to avoid applicability of 326 IAC 8-1-6, satisfy the requirement to limit the VOC emissions form the individual Shar unit to less than 25 tons per year such that 326 IAC 8-1-6 shall not apply.

In addition the limitation on Fill 4, of less than 25 tons per year of VOC, satisfies the requirement to limit the combined VOC emissions from Shar 4-1 through 4-4 and Fill 4 to less than 40 tons of VOC's such that the Prevention of Significant Deterioration Regulation 326 IAC 2-2 and 40 CFR Part 52.21shall not apply.

As a result of this determination the following changes were made to this permit:

(1) Changes to the description of emissions units Shar 1-1, Shar 1-2, Shar 1-3, and Shar 1-4 to reflect a maximum tank size of 1,100 gallons and that the maximum operating capacity is limited by Fill 1.

The Emission Unit descriptions in condition 2.A and Section D.1 were revised to read as follows (new language is bolded for emphasis):

(1) Plant 1 Blender 1, identified as emission unit Shar 1-1, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is ~~300~~ **1,100** gallons. ~~This is a batch operation with a 2.5 hour blend time.~~ **The maximum operating capacity is limited by Fill 1**. Emissions are exhausted out one stack identified as stack S-5. This unit was installed in 1979.

(2) Plant 1 Blender 2, identified as emission unit Shar 1-2, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is

~~1200~~ **1,100** gallons. ~~This is a batch operation with a 2.5 hour blend time.~~ **The maximum operating capacity is limited by Fill 1**. Emissions are exhausted out one stack identified as stack S-4. This unit was installed in 1995.

(3) Plant 1 Blender 3, identified as emission unit Shar 1-3, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is ~~700~~ **1,100** gallons. ~~This is a batch operation with a 2.5 hour blend time.~~ **The maximum operating capacity is limited by Fill 1**. Emissions are exhausted out one stack identified as stack S-3. This unit was installed in 1979.

(4) Plant 1 Blender 4, identified as emission unit Shar 1-4, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is ~~650~~ **1,100** gallons. ~~This is a batch operation with a 2.5 hour blend time.~~ **The maximum operating capacity is limited by Fill 1**. Emissions are exhausted out one stack identified as stack S-2. This unit was installed in 1988.

(5) Plant 1 Blender 5, identified as emission unit Shar 1-5, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is ~~150~~ **1,100** gallons. ~~This is a batch operation with a 2.5 hour blend time.~~ **The maximum operating capacity is limited by Fill 1**. Emissions are exhausted out one stack identified as stack S-2. This unit was installed in 1979.

(2) Changes to the description of emissions units Shar 4-1, Shar 4-2, Shar 4-3, Shar 4-4 and Shar 4-5 to reflect a maximum tank size of 1,100 gallons and that the maximum operating capacity is limited by Fill 4.

The Emission Unit descriptions in condition 2.A and Section D.1 were revised to read as follows (new language is bolded for emphasis):

(12) Plant 4 Blender 1, identified as emission unit Shar 4-1, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is 1,100 gallons. ~~This is a batch operation with a 2.5 hour blend time.~~ **The maximum operating capacity is limited by Fill 4**. Emissions are exhausted out one stack identified as stack S-6. This unit was installed in 1985.

(13) Plant 4 Blender 2, identified as emission unit Shar 4-2, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is 1,100 gallons. ~~This is a batch operation with a 2.5 hour blend time.~~ **The maximum operating capacity is limited by Fill 4**. Emissions are exhausted out one stack identified as stack S-6. This unit was installed in 1985.

(14) Plant 4 Blender 3, identified as emission unit Shar 4-3, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is ~~800~~ **1,100** gallons. ~~This is a batch operation with a 2.5 hour blend time.~~ **The maximum operating capacity is limited by Fill 4**. Emissions are exhausted out one stack identified as stack S-6. This unit was installed in 1985.

(15) Plant 4 Blender 4, identified as emission unit Shar 4-4, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is ~~800~~ **1,100** gallons. ~~This is a batch operation with a 2.5 hour blend time.~~ **The maximum operating capacity is limited by Fill 4**. Emissions are exhausted out one stack identified as stack S-6. This unit was installed in 1985.

(16) Plant 4 Blender 5, identified as emission unit Shar 4-5, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is ~~600~~ **1,100** gallons. ~~This is a batch operation with a 2.5 hour blend time.~~ **The maximum operating capacity is limited by Fill 4**. Emissions are exhausted out one stack identified as stack S-6. This unit was installed in 1994.

(3) Deletion of condition C.13 requiring the source to comply with the requirement to have an Emergency Episode Plan. This condition was deleted since the potential to emit VOC's is limited to less than 100 tons of VOC per year.

~~C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]~~

~~Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):~~

~~(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.~~

~~(b) These ERPs shall be submitted for approval to:~~

~~Indiana Department of Environmental Management~~
~~Compliance Branch, Office of Air Management~~
~~100 North Senate Avenue, P.O. Box 6015~~
~~Indianapolis, Indiana 46206-6015~~

~~and~~

~~Environmental Resources Management Division~~
~~Air Quality Management Section, Data Compliance~~
~~2700 South Belmont Avenue~~
~~Indianapolis, Indiana 46221~~

~~within ninety (90) days after the date of issuance of this permit.~~

~~The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(c) If the ERP is disapproved by IDEM, OAM, and ERMD, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.~~

~~(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.~~

~~(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.~~

~~(f) Upon direct notification by IDEM, OAM, and ERMD, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]~~

(4) Revisions to condition D.1.2 to reflect throughput limits on Fills 1 and 4 only. In addition the throughput limit of 1,200 ton of solvent per year, equivalent to 24 tons per year, was revised to 1,250 ton of solvent per year, equivalent to 25 tons per year.

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]**[326 IAC 2-2][40 CFR 52.51]**

The input of solvent to each of the following units; Fill 4, ~~Shar 4-1, Shar 4-2, Shar 4-3, Shar 4-4, Shar 4-5,~~ **and** Fill 1~~, Shar 1-2, and Shar 1-4~~ shall **not exceed** ~~be limited~~ ~~1,200~~ **1,250** tons per twelve (12) consecutive month period, rolled monthly. This emission limitation is equivalent to ~~24~~ **less than 25** tons of VOC emissions per unit per twelve (12) consecutive month period. Therefore the New Facilities Emissions Reduction Requirement Regulation 326 IAC 8-1-6 is not applicable.

This condition satisfies the requirements to limit the VOC emissions from Shar 1-2, Shar 1-4, Shar 4-1, Shar 4-2, Shar 4-3 and Shar 4-4 to less than 25 ton per year each, such that 326 IAC 8-1-6 shall not apply. This limitation also satisfies the requirement to limit the combined VOC emissions from Fill 4, Shar 4-1, Shar 4-2, Shar 4-3 and Shar 4-4 to less than 40 tons per year such that the PSD regulation 326 IAC 2-2 and 40 CFR 52.21 shall not apply.

(5) Deletion of condition D.1.2 PSD Minor Source Limit, since condition D.1.1 satisfies this requirement.

~~D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]~~

~~The total input of solvent to the following units; Fill 4, Shar 4-1, Shar 4-2, Shar 4-3, Shar 4-4, shall be limited 1,950 tons per twelve (12) consecutive month period, rolled monthly. This emission limitation is equivalent to 39 tons of VOC emissions per twelve (12) consecutive month period. Therefore the Prevention of Significant Deterioration Regulation 326 IAC 2-2 and 40 CFR 52.21 is not applicable.~~

(6) Condition D.1.4 (renumbered D.1.3) was revised to reflect deletion of condition D.1.2 . Condition D.1.4 (renumbered D.1.3) was revised to read as follows:

D.1.~~4~~**3** Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test these units by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.~~3~~**2** shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

(7) Condition D.1.5 (renumbered D.1.4) was revised to reflect compliance condition D.1.1 only and to include criteria used in demonstrating compliance with the solvent throughput limitation. Condition D.1.5 (renumbered D.1.4) was revised to read as follows:

D.1.~~5~~**4** Solvent Usage Limitation

Compliance with Condition D.1.1~~, and D.1.2~~ shall be demonstrated at the end of each month based on the total solvent usage for the most recent twelve (12) consecutive month period. **For the purposes of compliance with this condition the solvent content of coatings shall be assumed to be 40% by weight and the density of solvents shall be assumed to be 7.36 pounds per gallon.**

(8) Condition D.1.6 (renumbered D.1.5) was revised to reflect changes to condition D.1.1 and the deletion of condition D.1.2. Condition D.1.6 (renumbered D.1.5) was revised to read as follows:

D.1.~~6~~**5** Record Keeping Requirements

(a) To document compliance with Condition D.1.1~~, and D.1.2~~ the Permittee shall keep

monthly records of the quantity of solvents used per month for each of the following emission units; Fill 4~~, Shar 4-1, Shar 4-2, Shar 4-3, Shar 4-4, Shar 4-5,~~ **and** Fill 1~~, Shar 1-2, and Shar 1-4~~.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

(9) Condition D.1.7 (renumbered D.1.6) was revised to reflect the deletion of condition D.1.2. Condition D.1.7 (renumbered D.1.6) was revised to read as follows:

D.1.~~7~~**6** Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1,~~ and D.1.2~~ shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

(10) Revisions to reporting forms on page 36 and deletion of the reporting form on page 37. The reporting form on page 36 was revised to reflect throughput limits on Fills 1 and 4 only.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Patrick Coughlin, ERMD, 2700 South Belmont Avenue, Indianapolis, Indiana, 46221, or call at (317) 327-2510.

Sincerely,

Robert F. Holm Ph.D.
ERMD Administrator

Attachments

cc: File - ERMD

PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION

IVC Industrial Coating
2245-50 Valley Avenue
Indianapolis, Indiana 46218

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15, IC 13-17 and the Code of Indianapolis and Marion County, Chapter 511.

Operation Permit No.: T097-7794-00303	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management Robert F. Holm, PH.D, Administrator Indianapolis Environmental Resources Management Division	Issuance Date:

First Significant Permit Revision: T097-11727	Affected Pages: 4, 5, 24, 25, 30, 31, 32, 36, 37
Issued by: Robert F. Holm, PH.D, Administrator Indianapolis Environmental Resources Management Division	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and The Indianapolis Environmental Resources Management Division (ERMD).The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates stationary source where Industrial Coating are Formulated and Packaged.

Responsible Official:	Mr. Mark Hewitt
Source Address:	2245-50 Valley Avenue, Indianapolis, Indiana 46218
Mailing Address:	P.O. Box 18163, Indianapolis, Indiana 46218
SIC Code:	2851
County Location:	Marion
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD or Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) Plant 1 Blender 1, identified as emission unit Shar 1-1, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is 1,100 gallons. The maximum operating capacity is limited by Fill 1. Emissions are exhausted out one stack identified as stack S-5. This unit was installed in 1979.

(2) Plant 1 Blender 2, identified as emission unit Shar 1-2, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is 1,100 gallons. The maximum operating capacity is limited by Fill 1. Emissions are exhausted out one stack identified as stack S-4. This unit was installed in 1995.

(3) Plant 1 Blender 3, identified as emission unit Shar 1-3, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is 1,100 gallons. The maximum operating capacity is limited by Fill 1. Emissions are exhausted out one stack identified as stack S-3. This unit was installed in 1979.

(4) Plant 1 Blender 4, identified as emission unit Shar 1-4, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is 1,100 gallons. The maximum operating capacity is limited by Fill 1. Emissions are exhausted out one stack identified as stack S-2. This unit was installed in 1988.

(5) Plant 1 Blender 5, identified as emission unit Shar 1-5, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is 1,100 gallons. The maximum operating capacity is limited by Fill 1. Emissions are exhausted out one stack identified as stack S-2. This unit was installed in 1979.

(6) Plant 1 Mill 1, identified emission unit Little Mill, used to mill pigments, solvents and resins to produce concentrates. Maximum production capacity is 155.2 pounds per hour of concentrate. This is a batch operation with a two (2) hour mill time. Emissions are exhausted out one stack identified as stack S-1. This unit was installed in 1950.

(7) Plant 1 Mill 2, identified emission unit White Mill, used to mill pigments, solvents and resins to produce concentrates. Maximum production capacity is 223.6 pounds per hour of concentrate. This is a batch operation with a two (2) hour mill time. Emissions are exhausted out one stack identified as stack S-1. This unit was installed in 1950.

(8) Plant 1 Mill 3, identified emission unit Orange Mill, used to mill pigments, solvents and resins to produce concentrates. Maximum production capacity is 297.2 pounds per hour of concentrate. This is a batch operation with a two (2) hour mill time. Emissions are exhausted out one stack identified as stack S-1. This unit was installed in 1994.

(9) Plant 1 Mill 4, identified emission unit Dark Mill, used to mill pigments, solvents and resins to produce concentrates. Maximum production capacity is 285.2 pounds per hour of concentrate. This is a batch operation with a two (2) hour mill time. Emissions are exhausted out one stack identified as stack S-1. This unit was installed in 1986.

(10) Plant 1 Mill 5, identified emission unit Enclosed Mill, used to mill pigments, solvents and resins to produce concentrates. Maximum production capacity is 323.6 pounds per hour of concentrate. This is a batch operation with a two (2) hour mill time. Emissions are exhausted out one stack identified as stack S-1. This unit was installed in 1994.

(11) Plant 1 Fill Pump, identified as emission unit Fill 1, used to pump paint from the blending tanks into containers for shipping. The maximum filling capacity is 800 gallons per hour. emissions are vented inside the building. This unit was installed in 1983.

(12) Plant 4 Blender 1, identified as emission unit Shar 4-1, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is 1,100 gallons. The maximum operating capacity is limited by Fill 4. Emissions are exhausted out one stack identified as stack S-6. This unit was installed in 1985.

(13) Plant 4 Blender 2, identified as emission unit Shar 4-2, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is 1,100 gallons. The maximum operating capacity is limited by Fill 4. Emissions are exhausted out one stack identified as stack S-6. This unit was installed in 1985.

(14) Plant 4 Blender 3, identified as emission unit Shar 4-3, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is 1,100 gallons. The maximum operating capacity is limited by Fill 4. Emissions are exhausted out one stack identified as stack S-6. This unit was installed in 1985.

(15) Plant 4 Blender 4, identified as emission unit Shar 4-4, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is 1,100 gallons. The maximum operating capacity is limited by Fill 4. Emissions are exhausted out one stack identified as stack S-6. This unit was installed in 1985.

(16) Plant 4 Blender 5, identified as emission unit Shar 4-5, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is 1,100 gallons. The maximum operating capacity is limited by Fill 4. Emissions are exhausted out one stack identified as stack S-6. This unit was installed in 1994.

The Permittee:

(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notify:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet applicable the requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, and ERMD that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(1) Plant 1 Blender 1, identified as emission unit Shar 1-1, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is 1,100 gallons.The maximum operating capacity is limited by Fill 1. Emissions are exhausted out one stack identified as stack S-5. This unit was installed in 1979.

(2) Plant 1 Blender 2, identified as emission unit Shar 1-2, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is 1,100 gallons. The maximum operating capacity is limited by Fill 1. Emissions are exhausted out one stack identified as stack S-4. This unit was installed in 1995.

(3) Plant 1 Blender 3, identified as emission unit Shar 1-3, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is 1,100 gallons. The maximum operating capacity is limited by Fill 1. Emissions are exhausted out one stack identified as stack S-3. This unit was installed in 1979.

(4) Plant 1 Blender 4, identified as emission unit Shar 1-4, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is 1,100 gallons. The maximum operating capacity is limited by Fill 1. Emissions are exhausted out one stack identified as stack S-2. This unit was installed in 1988.

(5) Plant 1 Blender 5, identified as emission unit Shar 1-5, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is 1,100 gallons. The maximum operating capacity is limited by Fill 1. Emissions are exhausted out one stack identified as stack S-2. This unit was installed in 1979.

(6) Plant 1 Mill 1, identified emission unit Little Mill, used to mill pigments, solvents and resins to produce concentrates. Maximum production capacity is 155.2 pounds per hour of concentrate. This is a batch operation with a two (2) hour mill time. Emissions are exhausted out one stack identified as stack S-1. This unit was installed in 1950.

(7) Plant 1 Mill 2, identified emission unit White Mill, used to mill pigments, solvents and resins to produce concentrates. Maximum production capacity is 223.6 pounds per hour of concentrate. This is a batch operation with a two (2) hour mill time. Emissions are exhausted out one stack identified as stack S-1. This unit was installed in 1950.

(8) Plant 1 Mill 3, identified emission unit Orange Mill, used to mill pigments, solvents and resins to produce concentrates. Maximum production capacity is 297.2 pounds per hour of concentrate. This is a batch operation with a two (2) hour mill time. Emissions are exhausted out one stack identified as stack S-1. This unit was installed in 1994.

(9) Plant 1 Mill 4, identified emission unit Dark Mill, used to mill pigments, solvents and resins to produce concentrates. Maximum production capacity is 285.2 pounds per hour of concentrate. This is a batch operation with a two (2) hour mill time. Emissions are exhausted out one stack identified as stack S-1. This unit was installed in 1986.

Facility Description [326 IAC 2-7-5(15)]

(10) Plant 1 Mill 5, identified emission unit Enclosed Mill, used to mill pigments, solvents and resins to produce concentrates. Maximum production capacity is 323.6 pounds per hour of concentrate. This is a batch operation with a two (2) hour mill time. Emissions are exhausted out one stack identified as stack S-1. This unit was installed in 1994.

(11) Plant 1 Fill Pump, identified as emission unit Fill 1, used to pump paint from the blending tanks into containers for shipping. The maximum filling capacity is 800 gallons per hour. emissions are vented inside the building. This unit was installed in 1983.

(12) Plant 4 Blender 1, identified as emission unit Shar 4-1, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is 1,100 gallons. The maximum operating capacity is limited by Fill 4. Emissions are exhausted out one stack identified as stack S-6. This unit was installed in 1985.

(13) Plant 4 Blender 2, identified as emission unit Shar 4-2, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is 1,100 gallons. The maximum operating capacity is limited by Fill 4. Emissions are exhausted out one stack identified as stack S-6. This unit was installed in 1985.

(14) Plant 4 Blender 3, identified as emission unit Shar 4-3, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is 1,100 gallons. The maximum operating capacity is limited by Fill 4. Emissions are exhausted out one stack identified as stack S-6. This unit was installed in 1985.

(15) Plant 4 Blender 4, identified as emission unit Shar 4-4, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is 1,100 gallons. The maximum operating capacity is limited by Fill 4. Emissions are exhausted out one stack identified as stack S-6. This unit was installed in 1985.

(16) Plant 4 Blender 5, identified as emission unit Shar 4-5, used to blend resins, pigments and solvent to produce industrial paints. The largest blending tank that can be used is 1,100 gallons. The maximum operating capacity is limited by Fill 4. Emissions are exhausted out one stack identified as stack S-6. This unit was installed in 1994.

(17) Plant 4 Fill Pump, identified as emission unit Fill 4, used to pump paint from the blending tanks into containers for shipping. The maximum filling capacity is 800 gallons per hour. emissions are vented inside the building. This unit was installed in 1985.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The input of solvent to each of the following units; Fill 4 and Fill 1 each shall not exceed 1,250 tons per twelve (12) consecutive month period, rolled monthly. This emission limitation is equivalent to less than 25 tons of VOC emissions per unit per twelve (12) consecutive month period. Therefore the New Facilities Emissions Reduction Requirement Regulation 326 IAC 8-1-6 is not applicable.

This condition satisfies the requirements to limit the VOC emissions from Shar 1-2, Shar 1-4, Shar 4-1, Shar 4-2, Shar 4-3 and Shar 4-4 to less than 25 ton per year each such that 326 IAC

8-1-6 shall not apply. This limitation also satisfies the requirement to limit the combined VOC emissions from Fill 4. Shar 4-1, Shar 4-2, Shar 4-3 and Shar 4-4 to less than 40 tons per year such that the PSD regulation 326 IAC 2-2 and 40 CFR 52.21 shall not apply.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the Little Mill, White Mill, Orange Mill and Dark Mill shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

The process weight rate for the Little Mill, White Mill, Orange Mill and Dark Mill are 0.05, 0.075, 0.075 and 0.069 tons per hour respectively. The allowable PM emissions rates for the Little Mill, White Mill, Orange Mill and Dark Mill have been calculated to be 0.55, 0.72, 0.72 and 0.68 pounds per hour respectively.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test these units by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.4 Solvent Usage Limitation

Compliance with Condition D.1.1 shall be demonstrated at the end of each month based on the total solvent usage for the most recent twelve (12) consecutive month period. For the purposes of compliance with this condition the solvent content of coatings shall be assumed to be 40% by weight and the density of solvents shall be assumed to be 7.36 pounds per gallon.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.5 Record Keeping Requirements

(a) To document compliance with Condition D.1.1 the Permittee shall keep monthly records of the quantity of solvents used per month for each of the following emission units; Fill 4 and Fill 1.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE

Part 70 Quarterly Report

Source Name: IVC Industrial Coating
Source Address: 2245-50 Valley Ave. Indianapolis, Indiana 46218
Mailing Address: P.O. Box 18163, Indianapolis, Indiana 46218
Part 70 Permit No.: T097-7794-00303
Facility: Fill 4, and Fill 1
Parameter: Solvent Usage
Limit: 1,250 tons of solvent used per unit per twelve (12) consecutive month period such that 326 IAC 8-1-6 is not applicable.

YEAR: _____

Reporting Period\Emissions Unit	Fill 4	Fill 1
This Month		
Previous 11 Months		
Total 12 Months		
This Month		
Previous 11 Months		
Total 12 Months		
This Month		
Previous 11 Months		
Total 12 Months		

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Indiana Department of Environmental Management
Office of Air Management
and
Indianapolis Environmental resources Management Division

Technical Support Document (TSD) for a for a Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	**IVC Industrial Coating**
Source Location:	**2245-50 Valley Avenue, Indianapolis, Indiana 46218**
County:	**Marion**
SIC Code:	**2851**
Operation Permit No.:	**T097-7794-00303**
Permit Reviewer:	**Mr. Patrick Coughlin**
Operation Permit Issuance Date:	**12/28/98**
Permit Revision No.:	**T097-11727-00303**

The Office of Air Management (OAM) has reviewed a permit modification application from IVC Industrial Coating relating to a modification to the applicability of the new facilities general VOC reduction requirement 326 IAC 8-1-6 for emission units Shar 4-1, Shar 4-2, Shar 4-3, Shar 4-4, Shar 4-5, Shar 1-2, and Shar 1-4. This permit modification is being made based on revised potential to emit calculations submitted by IVC Industrial Coating. Since the PTE from each Shar unit is limited by the associated fill unit, limiting the fill unit to less than 1,250 tons of solvent per twelve consecutive month period satisfies the requirement to limit VOC emissions from each Shar unit to less than 25 tons per year such that 326 IAC 8-1-6 shall not apply.

History

On December 14, 1999, IVC Industrial Coatings submitted an application to the OAM and ERMD requesting to a modification to the applicability of 326 IAC 8-1-6 to the individual shar units. IVC Industrial Coatings was issued a Part 70 permit on December 29, 1998.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 13, 1999.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/ facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Little Mill	2.4 (1)	NL	NL	NL	NL	NL	Not Limited at this time.
Orange Mill	3.2 (1)	NL	NL	NL	NL	NL	
White Mill	3.2 (1)	NL	NL	NL	NL	NL	
Dark Mill	3.0 (1)	NL	NL	NL	NL	NL	
Fill 4	NL	NL	NL	<25 (2)	NL	NL	
Shar 4-1	NL	NL	NL		NL	NL	
Shar 4-2	NL	NL	NL		NL	NL	
Shar 4-3	NL	NL	NL		NL	NL	
Shar 4-4	NL	NL	NL		NL	NL	
Shar 4-5	NL	NL	NL		NL	NL	
Fill 1	NL	NL	NL	<25 (3)	NL	NL	
Shar 1-2	NL	NL	NL		NL	NL	
Shar 1-4	NL	NL	NL		NL	NL	
Total Emissions	<100	<100	<100	<100	NL	NL	> 10 tons of and individual HAP and > 25 tons of a combination of HAPs

(1) Potential Emissions are based on 326 IAC 6-3 and continuous hours of operation.

(2) The Potential to Emit VOC from Shar 1-2 and Shar 1-4 are limited by Fill 1. Limiting the VOC emissions from emission unit Fill 1 to less than 25 tons per year satisfies the requirement to limit VOC emissions from Shar 1-2 and Shar 1-4 to less than 25 ton each such that 326 IAC 8-1-6 does not apply.

(3) The Potential to Emit VOC from Shar 4-1, Shar 4-2, Shar 4-3, Shar 4-4, and Shar 4-5 are limited by Fill 4. Limiting the VOC emissions from emission unit Fill 4 to less than 25 tons per year satisfies the requirement to limit VOC emissions from Shar 4-1, Shar 4-2, Shar 4-3, Shar 4-4, and Shar 4-5 to less than 25 ton each such that 326 IAC 8-1-6 does not apply.

(NL) No applicable limit.

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

This regulation applies to sources with the PTE criteria air pollutants (PM, CO, VOC, NO_x, and SO_2) in excess of 100 tons per year.

Since the PTE of VOC for all equipment located in Plant 1 is limited by Fill 1 and all the equipment in Plant 4 is limited by Fill 4, the limits on Fill 1 and Fill 4, taken to avoid applicability of 326 IAC 8-1-6, have resulted in a source wide PTE is less than 100 tons per year. Therefore the requirements of 326 IAC 1-5-2 do not apply and condition C.13 was deleted from the permit.

State Rule Applicability - Individual Facilities

326 IAC 8-1-6 (General New Facilities VOC Emissions Reduction Requirement)

326 IAC 8-1-6 applies to the following units; Fill 1, Fill 4, Shar 4-1, Shar 4-2, Shar 4-3, Shar 4-4, Shar 1-2, Shar 1-4 and Shar 4-5, since these units were constructed after January 1, 1980, each unit has potential VOC emissions is greater than 25 tons per year and these units are not regulated under any other provisions of Article 8.

IVC Industrial Coatings Inc. has opted to limit the potential to emit VOCs to less the 25 tons per twelve (12) consecutive month period for Fill 1, Fill 4, Shar 4-1, Shar 4-2, Shar 4-3, Shar 4-4, Shar 1-2, Shar 1-4 and Shar 4-5 each such that the requirements of 326 IAC 8-1-6 shall not apply.

The PTE VOC from Shar 1-2 and Shar 1-4 is limited by Fill 1. Limiting the throughput of solvent from Fill 1 to 1,250 tons per twelve consecutive month period satisfies the requirements to limit VOC emissions from Shar 1-2 and Shar 1-4 to less than 25 tons per year each such that 326 IAC 8-1-6 shall not apply.

The PTE VOC from Shar 4-1, Shar 4-2, Shar 4-3, Shar 4-4, and Shar 4-5 is limited by Fill 4. Limiting the throughput of solvent from Fill 4 to 1,250 tons per twelve consecutive month period satisfies the requirement to limit VOC emissions from Shar 4-1, Shar 4-2, Shar 4-3, Shar 4-4, and Shar 4-5 to less than 25 tons per year each such that 326 IAC 8-1-6 shall not apply.

This usage limit was calculated using the following equation:

$$\frac{\frac{25\ tons}{yr}}{0.02\ VOC\ Loss\ Factor}\ ,\ \frac{1{,}250\ tons\ of\ Solvent}{yr}$$

Based on the 1995 emissions data the none of these units have actual VOC emissions greater than 25 tons per year.

326 IAC 2-2 (Prevention of Significant Deterioration)

IVC Industrial Coating is included on the list of 28 source categories and has the potential to emit VOCs in excess of 100 tons per year, therefore IVC Industrial coating is classified as a major PSD source. All modifications to the source after 1979 were reviewed under the PSD regulation.

(a) In 1984 and 1985 IVC Industrial Coating installed the following new units; Fill 4, Shar 4-1, Shar 4-2, Shar 4-3, Shar 4-4. Since these units were all installed at roughly the same time, ERMD has reviewed them as one project under the PSD regulation. The combined PTE for VOCs from this project exceeded the PSD significance threshold of 40 tons of VOCs per year, therefore the VOC emissions for these units were limited such that the PSD regulation shall not apply.

The PTE of VOCs from Shar 4-1, Shar 4-2, Shar 4-3, Shar 4-4 is all limited by Fill 4. Compliance with the throughput limitation for Fill 4 of less than 25 tons per year, taken to avoid applicability 326 IAC 8-1-6, satisfies the requirements of the PSD regulation.

(b) Emissions units Fill 1, Shar 1-2, Shar 1-4 were installed after 1980 and were not considered to be installed as one project based on the dates of installation. The PTE of VOCs form each of these units individually exceeded 40 tons per year. Therefore VOC emissions for these units were limited such that the PSD regulation shall not apply.

The PTE of VOCs from Shar 1-2, Shar 1-4 is all limited by Fill 1. Compliance with the throughput limitation for Fill 1 of less than 25 ton per year, taken to avoid applicability of 326 IAC 8-1-6, satisfies the requirements of the PSD regulation.

Conclusion

The operation of this coating manufacturing operation shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification Permit No. T097-11727-00303.